

EXHIBIT A

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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

Cung Le, Nathan Quarry, Jon Fitch, Brandon Vera, Luis Javier Vazquez, and Kyle Kingsbury on behalf of themselves and all others similarly situated,

Case No.: 2:15-cv-01045-RFB-(PAL)

Plaintiffs.

V.

Zuffa, LLC, d/b/a Ultimate Fighting
Championship and UFC,

DISCOVERY PLAN AND SCHEDULING ORDER

Defendant.

Under Fed. R. Civ. P. 26(f) and Local Rule 26-1, the respective parties conducted a discovery planning conference on April 15, 2015. On December 4, 2015, the parties jointly proposed certain case deadlines to the Court and submitted competing proposals as to those deadlines on which they could not agree in principle. (ECF No. 206 at pp. 34-35). On December 8, 2015, the Court ruled on the parties' disputed deadlines. (ECF No. 207). The Court has not ruled upon the parties' joint proposal, although the parties had nonetheless been informally attempting to observe those deadlines. However, because Defendant produced more than half of its document production after the agreed date for the substantial completion of document discovery, thereby causing substantial delay, Plaintiffs have demonstrated good cause for moving the agreed case deadlines and the Ordered deadlines for dispositive motions briefing by approximately 120-days as follows:

Case Event	Proposed Date
Parties Certify Substantial Completion of Document Discovery	September 1, 2016
Close of Fact Discovery	July 31, 2017
Plaintiffs' Opening Expert Reports (class and merits)	August 29, 2017
Last Day to Depose Experts Concerning Opening Reports	September 25, 2017
Opposition Expert Reports	October 25, 2017
Last Day to Depose Opposition Experts	November 30, 2017
Reply Expert Reports	December 14, 2017
Daubert Motions	January 15, 2018
Class Certification Motion	January 15, 2018
Daubert Opposition Briefs	March 15, 2018
Class Certification Opposition Brief	March 15, 2018
Daubert Reply Briefs	April 11, 2018
Class Certification Reply Brief	April 25, 2018
Class Certification Hearing	Court's Convenience
Summary Judgment Motions	July 2, 2018
Summary Judgment Opposition Briefs	August 3, 2018
Summary Judgment Reply Briefs	August 31, 2018
Pretrial Conference	September 2018
Trial	November 2018

IT IS SO ORDERED.

Date: _____

Honorable Peggy A. Leen
UNITED STATES MAGISTRATE JUDGE